

OCT 13 2020

MALCOLM R. TATOR (91189)
LAW OFFICES OF MALCOLM R. TATOR
2775 N. Ventura Road, Suite 106
Oxnard, CA 93036
Tel: 805.676.1985
Fax: 805.278.0163
Email: mtator@tatorlaw.com

Attorney for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA, CIVIL UNLIMITED

JULIE WETZEL,

Plaintiff,

vs.

KAISER PERMANENTE, KEVIN MOORE,
M.D., BRENT SANDERSON, M.D.,
AND DOES 1-50 INCLUSIVE,

Defendants.

) Case No.:
)
)

) **COMPLAINT**
)
)

Plaintiff alleges:

I.

MEDICAL MALPRACTICE

(AGAINST ALL DEFENDANTS)

1. Plaintiff does not know the true names of defendants sued
herein as Does 1-50 inclusive.

1 2. On or about August 2, 2019 Defendants were Plaintiff's
2 physicians.

3 3. On or about August 2, 2019 Defendants operated on
4 Plaintiff's left knee drilling one or more holes into a bone to
5 produce bleeding and to allow for re-growth of cartilage.
6

7 4. Defendants negligently failed to leave instructions for
8 Plaintiff on the subject of weight-bearing, and then negligently
9 gave her incorrect instructions calling for weight-bearing as
10 tolerated.
11

12 5. As a result of Defendants negligence, Plaintiff put weight
13 onto her left knee, discharging the blood and thus undoing the
14 purpose of the surgery.

15 6. As a proximate result of Defendants' negligence, Plaintiff
16 suffered pain, swelling, limited range of motion, and most
17 likely knee replacement.
18

19 7. As a further consequence of Defendants' negligence,
20 Plaintiff has incurred and will incur extra medical expense.

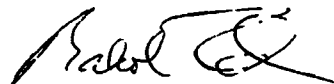
21 8. In addition, Plaintiff anticipates Defendants' negligence
22 will cause her to lose time in the future to recover from
23 medical procedures.
24

25 9. Plaintiff served Defendants with a Notice of Intention to
26 Sue on July 30, 2020.
27
28

1 Plaintiff therefore prays judgment against Defendants as
2 follows:

- 3 (1) General damages according to proof;
4
5 (2) Medical expenses, both past and future, according to
6 proof;
7
8 (3) For lost earning capacity and time according to proof;
9
10 (4) For costs of suit; and
11
12 (5) For such other and further relief as the court may deem
13 just and proper.

14 Dated this __13th__ of October, 2020.



15 MALCOLM TATOR
16 Attorney for Plaintiff Julie
17 Wetzel
18
19
20
21
22
23
24
25
26
27
28